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8 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13  
14 UNITED STATES OF AMERICA, ) No. CR 11-0811 EMC  
15 Plaintiff, )  
16 v. ) STIPULATION AND [PROPOSED]  
17 MEDCHEM CORPORATION, and ) ORDER CONTINUING MOTIONS  
HASAN IBRAHIM ) HEARING TO MAY 23, 2012  
18 Defendants. )  
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20 Through counsel, the parties hereby stipulate and agree as follows:

21 1. Defendants Hasan Ibrahim and MedChem Corporation have filed two motions,  
22 which are currently set for hearing on May 16, 2012. See Clerk's Record (CR) 30 (Motion to  
23 Dismiss), 31 (Motion to Settle Jury Instructions). Under the current briefing schedule, the  
24 government's oppositions are due on April 25 and the defendants' replies are due on May 2.

25 2. At the government's request, the parties have agreed to a one-week continuance of  
26 the hearing date and briefing schedule. Government counsel made this request because he was  
27 occupied with an extensive filing in *United States v. Pangang Group Company, Ltd.*, CR 11-  
28 0573 JSW (see CR 121-136) through April 19, 2012.

1           3.     Subject to the Court's approval, the parties agree to the following schedule:  
2     government's oppositions due on May 2, defendants' replies due on May 9, and motions' hearing  
3     on May 23, 2012 at 2:30 p.m.

**4** || SO STIPULATED:

6 || 4/23/12

/s/

7 | DATE

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PETER B. AXELROD  
Assistant United States Attorney

9 || 4/23/12

/s/

JAMES McNAIR THOMPSON  
Attorney for Hasan Ibrahim and MedChem Corp.

## ORDER

Based on the parties' stipulation, and for good cause appearing, the Court continues the hearing on the defendants' motions to dismiss and settle jury instructions (CR 30 and 31), currently set for May 16, 2012, to May 23, 2012, at 2:30pm. The governments' oppositions to these motions are now due on May 2, 2012, and defendants' replies are due on May 9, 2012.

IT IS SO ORDERED.

DATED: April 24, 2012

